

JUROR# _____

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

-----X

UNITED STATES OF AMERICA

-v-

09CR466 (BMC)

**JOAQUIN ARCHIVALDO GUZMAN LOERA
Defendant**

-----X

UNITED STATES DISTRICT JUDGE BRIAN M. COGAN

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK
225 CADMAN PLAZA EAST
BROOKLYN, NEW YORK**

JURORS ARE INSTRUCTED TO CALL: 1-800-522-5100

ON THURSDAY, NOVEMBER 1, 2018 AFTER 7:00 P.M.

FOR FURTHER REPORTING INSTRUCTIONS.

JUROR # _____

UNITED STATES v. JOAQUIN ARCHIVALDO GUZMAN LOERA

JUROR QUESTIONNAIRE

**THE ANSWERS TO THE QUESTIONS ON THIS PAGE WILL BE DISCLOSED
ONLY TO THE APPROPRIATE COURT PERSONNEL AS DIRECTED BY THE
PRESIDING JUDGE**

Please print the following information.

Name:

Home Address:

Home Phone:

Job Title & Department:

Business Address:

Cellular Telephone:

I hereby certify under penalty of perjury that the foregoing information, and all of the answers in this questionnaire, are true, correct, and complete to the best of my knowledge.

SIGNATURE _____

Date:

JUROR # _____

UNITED STATES v. JOAQUIN ARCHIVALDO GUZMAN LOERA
JUROR QUESTIONNAIRE INSTRUCTIONS

TO THE PROSPECTIVE JUROR:

Welcome to the courthouse and thank you for participating in jury service. This questionnaire is an important part of the jury selection process. You are sworn to give complete and truthful answers – under penalty of perjury – to the questions that follow. All of the information you provide will be kept confidential and will be seen only by the Judge, the Clerk's Office and the members of the prosecution and defense teams, including the defendant.

Citizens in our community hold different views and have had different life experiences that inform those views. We are genuinely interested in learning your views and feelings on a variety of issues. There are no “right” or “wrong” answers to these questions; just answer honestly and completely.

Please answer each question by placing a check next to the correct response and by providing the information requested. Take your time and answer each question as fully as possible. Answer all questions. If a question does not apply to you, fill in the space with an “N/A” for “not applicable.” Do not leave any answer blank. Write in dark ink and as legibly as possible. Please do not write on the back of any page. If you need extra space, you may continue your answer in the space provided at the end of the questionnaire.

It is important that the jury in no way be influenced by the public or the media. To protect your privacy and to assist you in discharging your responsibility as jurors fairly and impartially, you are part of an anonymous group of potential jurors. This means that no one, not the Judge, the media, the public, the parties to the case, the lawyers, or anyone else other than the Clerk of the Court, will have access to any of the identifying information that you provided on page 1. It is not uncommon for the Court to use an anonymous jury in cases that present a high public interest.

It is very important that you not discuss this questionnaire or your answers with friends, family, co-workers, court personnel or anyone else. The answers that you provide must be yours and yours alone. From this point forward, do not read or listen to any news about this case, including anything about the case on TV, radio, newspaper, websites, blogs, or social media. Do not discuss this case with anyone, including your family. Do not research this case or the people involved: do not research any of the facts presented in this questionnaire, any prior court proceedings, the victims, the defendant, the lawyers and/or the Judge. This includes research conducted on the internet or through any other source of information.

Jury service is one of the most important duties a citizen can be called on to perform. You will fulfill that civic duty by responding completely and honestly during jury selection. The Court appreciates your participation and cooperation.

JUROR # _____

UNITED STATES v. JOAQUIN ARCHIVALDO GUZMAN LOERA

also known as “El Chapo,” “El Rapido,” “Chapo Guzman,” “Shorty,” “El Senor,” “El Jefe,”
“Nana,” “Apa,” “Papa,” “Inge,” and “El Viejo”

09-cr-466 (BMC)

JUROR QUESTIONNAIRE

This questionnaire is designed to help simplify and expedite the jury selection process. You must give true and complete answers to all questions. Although some of the questions ask about personal details, please understand that your answers are critical in enabling the parties and the Court select a fair and impartial jury. Part of the selection process depends on your ability and promise to follow the law as the Court explains it to you. Thus, some of the questions include descriptions of legal principles and ask whether you can conscientiously follow them.

The defendant, Joaquin Archivaldo Guzman Loera, is charged with leading what is called a Continuing Criminal Enterprise, in violation of Title 21, United States Code, Sections 848(a), 848(b) and 848(c). Specifically, the indictment charges that he was the leader of a drug-trafficking organization known as the Sinaloa Cartel. Mr. Guzman Loera is also charged with participating in the following crimes: international conspiracy to manufacture and distribute cocaine, heroin, methamphetamine, and marijuana; conspiracy to import cocaine; conspiracy to distribute cocaine; international distribution of cocaine; unlawful use of firearms; and conspiracy to launder money. The fact that the grand jury made these charges does not mean that Mr. Guzman Loera is guilty. On the contrary, he is presumed innocent and that presumption continues until the Government has proven his guilt beyond a reasonable doubt.

This is just a summary of the charges to give you some background on the case. The court will instruct the jury on the elements of the crimes charged and the applicable law at a more appropriate time during trial.

JUROR # _____

BACKGROUND INFORMATION

1. What is your current age? _____
2. Are you ☐ Male or ☐ Female?
3. Where do you currently live? Borough/County: _____ Neighborhood: _____
4. How long have you lived there? _____
5. Where did you live before that? _____
6. How long did you live there? _____
7. Where were you born? _____
8. Where were your parents born? _____
9. Where were you raised? _____
10. Where else have you lived? (please include neighborhoods and any foreign countries) _____

11. Regarding your residence:

- (a) Do you ☐ Rent or ☐ Own ?
- (b) Without naming names, with whom do you live (relationship status only)?

- (c) Is your home a:
☐ House ☐ Townhouse
☐ Apartment/Condo ☐ Mobile Home
☐ Other (please explain) _____
- (d) Is the area where you live: ☐ Urban ☐ Suburban ☐ Rural

12. Are you currently: (Please check all that apply)

- | | |
|--|---|
| <input type="checkbox"/> Employed <i>full time</i> | <input type="checkbox"/> Retired |
| <input type="checkbox"/> Employed <i>part time</i> | <input type="checkbox"/> A student |
| <input type="checkbox"/> Employed <i>more than one job</i> | <input type="checkbox"/> Unemployed <i>looking for work</i> |
| <input type="checkbox"/> Self employed | <input type="checkbox"/> Unemployed <i>not looking for work</i> |
| <input type="checkbox"/> A homemaker | <input type="checkbox"/> Disabled |

JUROR # _____

13. If you are currently a student, what is your area of study? _____

14. If you are employed, describe your current occupation and job duties.

(Do NOT list name or location of employment. If you are currently retired or otherwise without a job, please write that and then complete information below for your *last job*).

(a) Check the following category that best describes your current (or immediate past) employer:

☐ Private, for-profit

☐ Private, non-profit

☐ Federal government department/
agency

☐ State government department/agency

☐ County government
department/agency

☐ City or local government
department/agency

☐ Other:

(b) How long have you held your current job? _____

15. What other types of jobs have you held throughout your life?

16. In your work, have you ever managed, directed or supervised others? ☐ YES ☐ NO

(a) If YES, how many people have you managed, directed or supervised? _____

(b) If YES, how long have you been a supervisor? _____

17. How far did you go in school (list any degrees or certificates)?

18. If you attended college or graduate school, what did you study?

19. Do you have plans to attend school in the future? ☐ YES ☐ NO

JUROR # _____

If YES, what are those plans and what will you study?

20. Other than English, what languages do you speak, read, or understand?

21. Some evidence and testimony in this case will be in Spanish. If you speak Spanish, would you have any difficulty relying solely on a court-certified translator's translation of that language? ☐ YES ☐ NO

If YES, please explain: _____

22. Have you, a family member or anyone close to you, ever served in any branch of the armed forces of the United States (including the military reserves, National Guard, or ROTC)? ☐ YES ☐ NO

(a) Please complete for each person:

Person (relation; NO name)	Branch	Highest Rank	Training / Duties

(b) Did you attend any special schools or receive special training? ☐ YES ☐ NO(c) Have you ever served in the Military Police or on a Court martial? ☐ YES ☐ NO(d) Have you ever served in combat? ☐ YES ☐ NO(e) Did you receive any medals, honors or commendations? ☐ YES ☐ NO(f) Are you currently in active service in the Armed Forces? ☐ YES ☐ NO

JUROR # _____

If YES to any of the above, please explain:

23. Have you, or any close family members, ever been self-employed or owned your own business?

☐ YES (you) ☐ YES (family) ☐ NO

Without listing names of any people or businesses, describe the kind of business, what person owned it, and for how long? _____

24. In your personal life, what special skills, hobbies and/or interests do you have, including foreign travel?

25. What community, civic, social, union, professional, fraternal, political, religious or recreational organizations do you belong to or are otherwise affiliated with (for example, PTA, Kiwanis, Rotary Club, American Legion, NRA, VFW, Masons, Knights of Columbus, political actions committees, etc.) Please identify the organization.

26. Do you attend any church, synagogue, mosque, temple, or do you participate in any other religious organization? ☐ YES ☐ NO

JUROR # _____

27. Do you have any moral, religious or ethical beliefs that prevent you from sitting in judgment of another person? ☐ YES ☐ NO If YES, please explain:

28. Have you, a family member, or anyone close to you, ever served or run for any elected federal, state, or local political office (e.g., Congress, state representative, selectman, school board, city council, mayor, etc.)? ☐ YES (you) ☐ YES (family/friend) ☐ NO

29. What is your current relationship status? _____

30. Please describe your spouse's/partner's/significant other's occupation, job duties, and highest level of education. Please do NOT list his/her place of employment.

31. Do you have any children? ☐ YES ☐ NO

If YES, please list the following for each: (Please include children you are currently raising or have ever raised even if they are not your biological children.)

Minor or Over 18?	Child Living With You (Yes or No)	Child's Highest Level of Education	Type of Occupation or Level in School (Do NOT list names of employers or schools)

JUROR # _____

MEDIA AND THE INTERNET

32. What publicly known person do you most admire and why? _____

33. What publicly known person do you least admire and why? _____

34. How often do you make it a point to follow the news?

☐ Every day ☐ Almost every day ☐ Several times a week ☐ Several times a month ☐ Never

35. Which sources do you regularly rely on for news?

☐ Television ☐ Newspapers ☐ Radio ☐ Internet ☐ Magazines ☐ Personal conversations

☐ Other (list other sources): _____

36. Please list the names of your regular news sources (for example, Wall Street Journal, NY Times, NY

Post, CNN, Fox News, Univision, etc.): _____

37. Have you ever called in to a radio talk show, written a letter to the editor, participated in any web-blogs

or chat rooms on the internet or posted a comment online? ☐ YES ☐ NO

(a) If YES, what type: ☐ Radio Caller ☐ Editorial

☐ Blog/Chat Room ☐ Posted Comment

(b) If YES, what topics have you addressed?

JUROR # _____

38. What magazines or journals do you subscribe to?

39. What is your favorite book and why?

40. What are your favorite television shows?

41. Do you watch any television programs or read any books about crime, including shows about drug trafficking or drug cartels, the criminal justice system or correctional institutions (for example, jails, prisons or penitentiaries)? ☐ YES ☐ NO If YES, please list them: _____

42. As a general rule, do you follow crime stories in the media? ☐ YES ☐ NO

If YES, what case(s) have you followed and what was your interest?

43. What are your favorite Internet sites, blogs or social media sites?

JUROR # _____

44. Do you have your own online blog or do you contribute to any blog sites? ☐ YES ☐ NO

If YES, without listing names or identifying the blog, please explain the nature of the blog: _____

45. Do you have any social media accounts (Facebook, Instagram, Twitter, Snapchat, etc.)?

☐ YES ☐ NO

If YES, please describe the types of topics of interests and types of posts:

46. How often do you tweet, blog, or post comments on the Internet?

☐ Every day ☐ Almost every day ☐ Several times a week ☐ Several times a month ☐ Never

47. Please list any stickers, placards, signs, patches, symbols, and other messages that you display at home or on an automobile, motorcycle, bicycle, bag, backpack, laptop computer, etc.

JUROR # _____

KNOWLEDGE OF THE CRIME, CASE, AND PEOPLE

The media has reported on this case. We are interested in what you may recall. Please only describe your recollection. Do NOT conduct any new research.

48. The case for which you are summoned involves the defendant JOAQUIN ARCHIVALDO GUZMAN LOERA, also known as “El Chapo.” Have you read, seen or heard anything about the defendant, the case, or people involved?

☐ YES ☐ NO ☐ Sounds familiar, but unsure

If YES, please describe in detail what you recall reading, seeing, or hearing about the defendant, the alleged crimes, the court proceedings, or the people involved (regardless of whether you believe this information is accurate).

49. This case involves allegations about a drug trafficking organization known as the Sinaloa Cartel. Have you read, seen or heard about the Sinaloa Cartel?

☐ YES ☐ NO ☐ Unsure

If YES, please describe in detail what you recall reading, seeing or hearing about the Sinaloa Cartel, and your views or feelings about that information.

50. Have you ever talked about or overheard discussions about any aspect of this case among friends, family, or coworkers? ☐ YES ☐ NO ☐ Unsure If YES, please describe what you/they talked about:

JUROR # _____

51. Have you ever read or posted opinions, likes, shares or any other information online related to this case or the people involved? ☐ YES ☐ NO

If YES, please describe: _____

52. Have you ever posted opinions online about any court proceeding? ☐ YES ☐ NO

If YES, please describe: _____

53. This case involves allegations about a criminal enterprise commonly known as a drug cartel. Do you have any views or feelings about serving as a juror in a case where the defendant has been accused of having connections with a drug cartel? ☐ YES ☐ NO If YES, what are your views or opinions?

54. How closely have you followed media coverage about criminal groups referred to as drug cartels?

☐ Very closely ☐ Somewhat closely ☐ Not too closely ☐ Not at all

55. What, if any, drug cartels have you heard about in media coverage?

56. If you are familiar with media coverage of drug cartels, is there anything about such coverage that would prevent you from being a fair and impartial juror? ☐ YES ☐ NO

JUROR # _____

If YES, please explain: _____

57. Are you familiar with Jesus Malverde? ☐ YES ☐ NO

If YES, please explain: _____

58. The defendant is charged with leading a continuing criminal enterprise, which involved drug-trafficking offenses and conspiracy to commit murders; international cocaine, heroin, methamphetamine and marijuana manufacture and distribution conspiracy; cocaine importation conspiracy; cocaine distribution conspiracy; international distribution of cocaine; cocaine distribution; possession of firearms in relation to drug trafficking; and conspiracy to launder narcotics proceeds. Is there anything about the nature of these charges, without more, that would interfere with your ability to decide this case fairly and impartially in accordance with the instructions of the court? ☐ YES ☐ NO If YES, please explain: _____

59. Do you have any specific views or feelings concerning the legalization of drugs, such as cocaine, heroin, methamphetamine and marijuana, in this country? ☐ YES ☐ NO If YES, what are your views or opinions and would they affect your ability to serve as a fair and impartial juror?

60. Would the fact that this case involves allegations of large-scale narcotics trafficking by the defendant interfere with your ability to consider the evidence with an open mind or serve as a fair and impartial juror?

☐ YES ☐ NO If YES, please explain: _____

61. The charges in this case involve allegations related to a conspiracy to murder several people. Is there anything about the charges, without more, that you believe would affect your ability to serve as a fair and impartial juror?

JUROR # _____

EXPERIENCES WITH AND OPINIONS ABOUT THE CRIMINAL JUSTICE SYSTEM62. Have you ever served as a juror? ☐ YES (at trial) ☐ YES (grand jury) ☐ NO

(a) Please complete for each case:

Year	Civil or Criminal	State or Federal	Nature of Case	Did You Reach a Verdict? (Yes/No)	Were you the foreperson? (Yes/No)

(b) How did you feel about your jury service(s)?

(c) Would that experience affect your ability to be fair and impartial in this case? ☐ YES ☐ NO

If YES, please explain:

63. Have you *or* a friend or family member ever been employed, trained, applied for work, or volunteered in any law-enforcement agency, corrections, or a related field? (for example: police officer, sheriff, FBI, jail, probation officer, private security, etc.) ☐ YES (self) ☐ YES (friend or family member) ☐ NO

If YES, without listing anyone's name, please list your relationship with that person, the job or nature of experience, and the location and approximate dates:

JUROR # _____

64. Have you *or* a friend or family member ever been employed by or volunteered in any aspect of criminal-defense work, including any Public Defender's office, a Legal Aid, or with a related support or advocacy group having to do with the rights of people charged with crimes?

☐ YES (self) ☐ YES (friend or family member) ☐ NO

(a) If YES, without listing names, please list your relationship with that person, the job or nature of experience, and the location and approximate dates:

(b) Would anything about that experience affect your ability to be fair and impartial in this case?

☐ YES ☐ NO If YES, please explain: _____

65. Do any of your relatives or close friends work for a criminal lawyer or private investigator?

☐ YES ☐ NO

If YES, for how long and please explain his/her/their relationship to you:

66. Do you have any friends or family members who have ever been lawyers, judges, law clerks, or otherwise involved in the legal field? ☐ YES ☐ NO If YES, without listing names, please explain:

67. Have you, a family member, or close friend ever practiced law in the area of prosecution?

☐ YES (you) ☐ YES (family/friend) ☐ NO If YES, please explain:

JUROR # _____

68. Would that experience affect your ability to be fair and impartial in this case? ☐ YES ☐ NO

If YES, please explain:

69. Have you or anyone close to you ever had a particularly positive or negative experience involving the police or any law enforcement agency? ☐ YES ☐ NO

If YES, without listing names, please explain: _____

Would that experience affect your ability to be fair and impartial in this case? ☐ YES ☐ NO

If YES, please explain: _____

70. Have you or anyone close to you ever had a particularly positive or negative experience involving a defense attorney or defense-related entity? ☐ YES ☐ NO

If YES, without listing names, please explain: _____

Would that experience affect your ability to be fair and impartial in this case? ☐ YES ☐ NO

JUROR # _____

If YES, please explain: _____

71. Have you *or* a friend or family member ever been accused of, charged with, or convicted of any crime, or been the subject of a criminal investigation? ☐ YES (self) ☐ YES (friend/family member) ☐ NO

(a) If YES, without listing names, please complete for each instance:

Person (Relation Only)	Accusations/Charges	Trial (Yes/No)	Outcome/Result

If you need additional space, please continue on the pages provided at the end of the questionnaire.

(b) Would anything about that experience affect your ability to be fair and impartial in this case?

☐ YES ☐ NO If YES, please explain:

JUROR # _____

72. Have you, a family member or anyone close to you, ever been the victim of or a witness to a crime, whether or not that crime was reported to law enforcement?

☐ YES (self) ☐ YES (friend or family member) ☐ NO

(a) If YES, without listing names, please complete for each instance:

Person (relation)	Victim or Witness	Type of Crime	Reported (Yes/No)	Testified (Yes/No)	Outcome/Result

(b) Would anything about that experience affect your ability to be fair and impartial in this case?

☐ YES ☐ NO If YES, please explain:

73. Have you, or has anyone close to you, ever felt fearful of or threatened by people who you thought were associated with drug crimes? ☐ YES (self) ☐ YES (friend or family member) ☐ NO

If YES, please describe: _____

JUROR # _____

74. Have you ever, any member(s) of your family, or anyone close to you ever appeared in court or been involved in any legal proceeding as a plaintiff, witness or defendant?

(a) ☐ YES (self) ☐ YES (friend or family member) ☐ NO

If YES, without listing names, please explain:

(b) If YES, please describe the type of proceeding and, if a witness, which party called you as a witness:

(c) Would that experience affect your ability to be fair and impartial in this case? ☐ YES ☐ NO

If YES, please explain:

75. Have you ever been involved, or do you expect to become involved, in any legal action or dispute with a government agency or have you had any financial interest in such a dispute? ☐ YES ☐ NO

(a) If YES, please explain: _____

(b) Is there anything about that experience that would affect your ability to be a fair and impartial juror in this case? ☐ YES ☐ NO

If YES, please explain: _____

JUROR # _____

76. Have you, or has anyone you know, ever been involved in providing the government with information in a criminal investigation? ☐ YES (you) ☐ YES (someone you know) ☐ NO

If YES, without listing names, please explain the type of case and the circumstances:

77. Have you or a close friend or family member ever been in prison?

☐ YES (self) ☐ YES (friends/family) ☐ NO

(a) If YES, without listing names, please explain: _____

(b) Would that experience affect your ability to be fair and impartial in this case? ☐ YES ☐ NO

If YES, please explain: _____

78. How serious a problem is crime in your community or neighborhood?

☐ Very Serious ☐ Somewhat Serious ☐ Not Serious

(a) What is the most serious crime you can remember occurring in your community or neighborhood in the past 10 years? _____

(b) Is there a neighborhood watch or crime prevention group in your neighborhood?
☐ YES ☐ NO

(c) Are you aware of any gang activity in your community or neighborhood?
☐ YES ☐ NO

(d) Are you aware of any illegal drug activity in your community or neighborhood?
☐ YES ☐ NO

(e) Have you ever moved or considered moving because you thought crime was a problem in your neighborhood?

☐ YES, moved ☐ YES, considered moving ☐ NO

JUROR # _____

79. Have you, a family member, or a close friend ever had any experience with drug organization activity?

☐ YES (self) ☐ YES (friends/family) ☐ NO If YES, without listing names, please explain:

80. The defendant is accused of engaging in drug-trafficking activity outside of the United States, knowing that the drugs would ultimately be sent to the United States. Do you have any personal feelings about the United States government prosecuting someone whose conduct mainly occurred outside of the United States? ☐ YES ☐ NO

If YES, please describe whether those feelings will affect your ability to evaluate the evidence in this case fairly and impartially:

81. Do you have any strong feelings or belong to any organizations related to the drug laws now in effect in the United States that could affect your ability to be fair and impartial or affect your ability to follow the Court's legal instructions? ☐ YES ☐ NO If YES, please explain:

82. The defendant is accused of illegally distributing cocaine, heroin, methamphetamine, and marijuana. Have you had any personal experiences, either yourself or with your family members or close friends, involving drug abuse? ☐ YES (you) ☐ YES (friend/family) ☐ NO If YES, please explain:

JUROR # _____

83. Have you ever taken any courses or worked in the fields of drug abuse counseling, law, criminal justice, criminology, or other related areas? ☐ YES ☐ NO If YES, please explain: _____

84. Have you ever known anyone, including yourself, who was the victim of an assault, homicide, or other act of violence that required medical treatment? ☐ YES ☐ NO

If YES, please explain:

85. Do you, anyone in your household, or any close friends own a gun? ☐ YES ☐ NO

If YES, please state your relationship to that person (do NOT list any names, but instead put your relationship, for example: "wife" or "friend"), how many, and what type(s) of firearm(s).

86. Have you, a family member, or a close friend ever filed a complaint against anyone with the police or any law-enforcement agency? ☐ YES ☐ NO

If YES, please describe the circumstances surrounding the complaint.

JUROR # _____

87. Have you or anyone close to you ever had a particularly positive or negative experience involving the police or any law enforcement agency? ☐ YES ☐ NO If YES, without listing names, please explain:

88. Do you believe that police or law enforcement officers are more likely to tell the truth than other witnesses? ☐ YES ☐ NO If YES, please explain your views:

89. Do you believe that police or law enforcement officers are more likely to lie than other witnesses?

☐ YES ☐ NO If YES, please explain your views: _____

90. Some government witnesses may testify that they participated in serious crimes, including drug-trafficking offenses and violent crimes. These witnesses, who may be referred to during trial as “cooperating witnesses,” may have criminal histories, may have pleaded guilty to crimes, and may be testifying pursuant to agreements with the government in hope that their own sentences will be reduced. Use of these witnesses is lawful.

(a) The testimony of any witness who may have an interest in the outcome of the case including — among other types of witnesses — a cooperating witness, should be carefully scrutinized. Would you be able and willing to fairly and impartially assess the testimony of such a witness, in accordance with the Court’s instructions? ☐ YES ☐ NO If NO, please explain:

JUROR # _____

(b) Do you have feelings about a witness seeking a reduced sentence by cooperating that would make it difficult for you fairly and impartially to consider that testimony or render a guilty verdict based on the testimony of such witness? ☐ YES ☐ NO If YES, please explain:

(c) It is the law that the testimony of a single witness, including a cooperating witness, can be sufficient to convict a defendant of a charged crime, if the jury finds that the testimony of that witness established proof beyond a reasonable doubt. Do you have any opinion or belief about the law or cooperating witnesses that would prevent you from applying this rule of law? ☐ YES ☐ NO If YES, please explain:

91. The law provides that the government can, once it demonstrates probable cause to believe that a crime has been or will be committed, obtain authorization from a court to intercept someone's emails, text messages, telephone calls, and VOIP (voice over internet protocol) calls. Do you have any particular feelings about this law that would affect your ability to evaluate the evidence fairly and impartially? ☐ YES ☐ NO If YES, please explain:

92. Under the law, the facts are for the jury to determine and the law is for the Judge to determine. You are required to accept the law as the Judge explains it to you even if you do not like the law or disagree with it, and you must determine the facts according to those instructions. Would you have any difficulty following the Judge's instructions? ☐ YES ☐ NO If YES, please explain:

JUROR # _____

93. The United States has the burden of proving the defendant's guilt beyond a reasonable doubt. This burden never shifts to the defendant. The defendant is presumed innocent and cannot be found guilty unless the jury, unanimously and based solely on the evidence in this case, decides that his guilt has been proven beyond a reasonable doubt. Will you accept and apply this rule of law? ☐ YES ☐ NO

If NO, please explain:

94. Under the law, a defendant need not offer any evidence on his or her behalf. If a defendant chooses not to offer any evidence, the jury is not permitted to consider that fact in any way in reaching a decision as to whether a defendant has been proven guilty. Will you accept and apply these rules of law?

☐ YES ☐ NO If NO, please explain:

95. The law also provides that under the Constitution, a person accused of a crime does not need to testify in his defense. If a defendant does not testify in his defense, you may not use his decision not to testify against him. Will you accept and apply this rule of law? ☐ YES ☐ NO If NO, please explain:

96. An indictment is a document that sets forth the charges with which the defendant is accused. This means that the indictment may not be considered as any evidence whatsoever of guilt.

Do you have any concerns about applying this principle? ☐ YES ☐ NO If YES, please explain:

JUROR # _____

97. Under the law, the question of punishment (*i.e.*, what sentence the defendant will receive, if any), should not enter your deliberations. Would you have any difficulty following this rule? ☐ YES ☐ NO

If YES, please explain:

98. Under the law, emotions such as sympathy, bias, and prejudice must not enter into the deliberations of the jurors as to whether the guilt of the defendant has been proven beyond a reasonable doubt. Would you have any difficulty following this rule? ☐ YES ☐ NO If YES, please explain:

99. Do you have any views about people of other races or ethnicities that would affect your ability to be a fair and impartial juror? ☐ YES ☐ NO If YES, please explain:

100. Do you have any personal views toward people of Mexican descent that would cause you to doubt your ability to be a fair and impartial juror? (Note: If you would like to discuss or answer this question in a more private setting, please write "private" next this question.) ☐ YES ☐ NO

If YES, please explain:

JUROR # _____

JURY SERVICE QUESTIONS

101. If you are selected as a juror in this case, the Judge will instruct you to avoid all media coverage, and not to go on the Internet with regard to this case for any purpose. That is, you will be forbidden from reading newspaper articles about this case, Googling or performing any other search on this case, blogging/tweeting about it or posting comments on any social media sites, etc. Do you have any reservations or concerns about your ability or willingness to follow this instruction? ☐ YES ☐ NO

If YES, please explain: _____

102. Is there anything about the nature of the charges or the facts of the case as they have been explained to you thus far that would affect your ability to serve as a juror in this case? ☐ YES ☐ NO

If YES, please explain: _____

103. If you were selected to serve on this jury, would you consider and respect the views of other jurors even if their views differed from yours, in accordance with the Court's instructions, before making your decision? ☐ YES ☐ NO Please explain: _____

JUROR # _____

104. Please review the list of names and organizations on Attachment A (page 31) and then answer this

question: **Are you familiar with any of the individuals or organizations named on the list?**

☐ YES ☐ NO ☐ UNSURE

If YES or UNSURE, list who you know or may know, and how you are or may be familiar with them:

105. This case is being prosecuted by the United States Attorney's Offices for the Eastern District of New York and the Southern District of Florida, and the Narcotic and Dangerous Drug Section of the Department of Justice. Do you, a family member or anyone close to you, know or have any connection with the following Offices, Departments or prosecuting attorneys, their relatives or friends, or know anything at all about them? ☐ YES ☐ NO If YES, please explain:

JUROR # _____

106. This case has been investigated by the Drug Enforcement Administration. Do you, a family member, or anyone close to you, know or have any connection with employees or investigators from the Drug Enforcement Administration, their relatives or friends, or know anything at all about them?

☐ YES ☐ NO If YES, please explain:

107. This case has been investigated by the Federal Bureau of Investigation. Do you, a family member, or anyone close to you, know or have any connection with employees or investigators from the Federal Bureau of Investigation, their relatives or friends, or know anything at all about them? ☐ YES ☐ NO

If YES, please explain:

108. This case has been investigated by the Department of Homeland Security - Homeland Security Investigations. Do you, a family member, or anyone close to you, know or have any connection with employees or investigators from the Department of Homeland Security - Homeland Security Investigations, their relatives or friends, or know anything at all about them? ☐ YES ☐ NO If YES, please explain:

JUROR # _____

109. Do you, a family member or anyone close to you, know or have any connection to any of the following defense attorneys, including their relatives or friends or know anything at all about these defense attorneys or the offices where they work?

- | | | |
|--|------------------------------|-----------------------------|
| (a) A. Eduardo Balarezo, Washington, DC | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| (b) William B. Purpura, Baltimore, MD | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| (c) Rebecca Miriam Heinegg, New York, NY | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| (d) Jeffrey H. Lichtman, New York, NY | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| (e) Paul R. Townsend, New York, NY | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| (f) Michael Leigh Lambert, New York, NY | <input type="checkbox"/> YES | <input type="checkbox"/> NO |

If YES, please explain:

110. The trial judge assigned to this case is the Honorable Brian M. Cogan. Do you, a family member or anyone close to you; have any connection (personal, business or social) with Judge Cogan or any member of his staff? ☐ YES ☐ NO

(a) Do you know anyone who works in the Eastern District (Brooklyn) Federal Courthouse or any other Federal Courthouse? ☐ YES ☐ NO If YES, please explain: _____

JUROR # _____

ATTACHMENT A: NAMES & ORGANIZATIONS

Please review the following names. If you are familiar with any of these individuals or organizations, please check “YES” on page 28 and indicate there who you know, and the nature of your relationship.

[INSERT ATTORNEY, WITNESS, GROUPS AND ORGANIZATIONS, LOCATIONS LIST HERE]

JUROR # _____

SCHEDULING AND ABILITY TO SERVE

This trial is expected to begin on November 5, 2018, and last approximately sixteen weeks. Court sessions will last from approximately 9:30 AM until 4:30 PM, Monday through Thursday or Friday, depending on the week. There will be breaks in the morning and afternoon and a one-hour break for lunch. The Court will not be in session on the following days: November 21-23, December 7, 14, 21, 24-26 and December 31 to January 2.

111. Do you have any personal, family, or professional obligations that you feel would seriously interfere with your ability to focus and concentrate as a juror in this case? ☐ YES ☐ NO ☐ UNSURE

If YES, please explain:

112. Does your employer pay you for time missed as a result of jury service?

☐ YES ☐ NO ☐ UNSURE*

****If you are unsure, please find out before you return to court for jury selection questioning.***

113. Do you have any personal commitment or non-refundable travel plans that cannot be rescheduled that would make it impossible for you to attend court as scheduled above? ☐ YES ☐ NO

If YES, please describe your circumstances.

114. Do you have any condition, disability, or need that will require any special consideration or accommodation while you are in court? ☐ YES ☐ NO If YES, please explain:

JUROR # _____

115. Do you have hearing difficulties not corrected by a hearing aid? ☐ YES ☐ NO

116. Do you have trouble seeing even with glasses? ☐ YES ☐ NO

(a) Are you taking any medication(s) regularly? ☐ YES ☐ NO

(b) Do any of these medications affect your memory or concentration? ☐ YES ☐ NO

117. Do you have any difficulty reading or understanding English? ☐ YES ☐ NO

118. Do you wish to apply to the Court to be excused on the grounds that jury service in this case would be a serious hardship to you? ☐ YES ☐ NO If YES, please describe your circumstances.

JUROR # _____

ADDITIONAL COMMENT PAGE

(Please put the question number in front of your answer.)

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.